

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

NATHAN DANIEL LARSON,
a/k/a "Leucosticte,"

JACOB ROYCE MULLINS,
a/k/a "NotJ,"

KYLE WILLIAM LEISHEAR,
a/k/a "DirtMcGirt,"

WILLIAM CHRISTOPHER KUEHNER,
a/k/a "nechris,"

and

MATTHEW MARTIN,
a/k/a "AgentNippy,"

Defendants.

Criminal No. 1:22-CR-120

Count 1: 18 U.S.C. § 2252A(g)
Engaging in a Child Exploitation Enterprise

Forfeiture Notice

UNDER SEAL

INDICTMENT

July 2022 Term - at Alexandria, Virginia

COUNT ONE
(Engaging in a child exploitation enterprise)

THE GRAND JURY CHARGES THAT:

From at least as early as September 2020 through in or about December 2020, within the
Eastern District of Virginia and elsewhere, the defendants,

NATHAN DANIEL LARSON,
a/k/a "Leucosticte,"

JACOB ROYCE MULLINS,
a/k/a “NotJ,”

KYLE WILLIAM LEISHEAR,
a/k/a “DirtMcGirt,”

WILLIAM CHRISTOPHER KUEHNER,
a/k/a “nechris,”

and

MATTHEW MARTIN,
a/k/a “AgentNippy,”

and other persons, both known and unknown to the Grand Jury, knowingly engaged in a child exploitation enterprise, in that each of the defendants committed violations of the following provisions of chapter 110 and chapter 117 of Title 18 of the U.S. Code—that is, Title 18, U.S. Code, Sections 2251(a), 2251(e), 2252(a)(1), 2252(a)(2), 2422(b), 2423(b), and 2423(e)—as part of a series of felony violations constituting three or more separate incidents and involving more than one minor victim, and committed those offenses in concert with three or more other persons.

(All in violation of 18 U.S.C. § 2252A(g).)

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

Pursuant to Federal Rule of Criminal Procedure 32.2(a), upon conviction of the sole Count set forth in the Indictment and as part of sentencing, the defendants,

NATHAN DANIEL LARSON,
a/k/a "Leucosticte,"

JACOB ROYCE MULLINS,
a/k/a "NotJ,"

KYLE WILLIAM LEISHEAR,
a/k/a "DirtMcGirt,"

WILLIAM CHRISTOPHER KUEHNER,
a/k/a "nechris,"

and

MATTHEW MARTIN,
a/k/a "AgentNippy,"

shall forfeit to the United States: (1) any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260; (2) any property real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

In addition, it is the intent of the United States, pursuant to 18 U.S.C. § 2253(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant(s), up to the value of the property subject to forfeiture, if any of the property subject to forfeiture, as a result of any act or omission of a defendant, cannot be located upon the exercise of due diligence;

has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(In accordance with 18 U.S.C. §§ 2253(a) & (b); 21 U.S.C. § 853(p); and Fed. R. Crim. P. 32.2.)

A TRUE BILL

Pursuant to the E-Government Act,,
The original of this page has been filed
~~under seal in the Clerk's Office~~
FOREPERSON

Jessica D. Aber
United States Attorney

By:



Whitney Kramer
Special Assistant United States Attorney (LT)
Seth Schlessinger
Assistant United States Attorney